



KAKAR, P.C.

Sumeer Kakar, Esq.
Kalpana Nagampalli, Esq.
525 Seventh Avenue
Suite 1811
New York, NY 10018
Phone: 212-704-2014
sk@kakarlaw.net
kalpana@kakarlaw.net

March 29, 2020

VIA ECF

Hon. Magistrate Stewart D. Aaron
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., 11 C
New York, NY 10007-1312
Email: Aaron_NYSDChambers@nysd.uscourts.gov

Application GRANTED. SO ORDERED.

Dated: March 30, 2020

Re: Gogo Apparel, Inc. v. Daruk Imports, Inc *et al*, 19-cv-5701(LGS)(SDA)

Dear Magistrate Judge Aaron:

We represent Plaintiff Gogo Apparel, Inc. ("Gogo") and submit this urgent request for extension of time to file Plaintiff's Motion for Default Judgment. We request the Court grant Gogo's first request for an extension of time to file its Motion for Default Judgement.

In these unprecedented times and Covid-19 lockdown, Gogo requests the Court grant a 45-day extension to file its motion for default judgment. Currently, our firm is operating remotely and we are unable to access certain records and proofs that are available in our office. As the public health emergency unexpectedly caused us to operate from home, we have not been able to go to our offices. Moreover, we are unable to comply with the default judgment service procedures on Defendants in the current environment. An additional complexity arises as the service on individual defendant in this matter that requires Gogo to retain a process server.

As a result, Gogo is hampered in preparing the motion for default judgment and comply with the service procedures. We respectfully submit that the Court grant Gogo's first request for extension of time to file and serve its Motion for Default Judgement on Defendants from March 30, 2020 to May 14, 2020.

Thank you in advance for consideration of our request.

Respectfully submitted,
/s/Kalpana Nagampalli
Kalpana Nagampalli